

# Morgan Lewis

Application GRANTED. The Initial Pretrial Conference set for August 12, 2020 is ADJOURNED to October 13, 2020 at 4:00 p.m. The parties are directed to call (888) 251-2909 and use access code 2123101. A proposed case management plan shall be submitted one week prior.

*No further extensions.*


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7/10/2020

July 10, 2020



LEWIS J. LIMAN  
United States District Judge

## VIA ECF

The Honorable Lewis J. Liman, U.S.D.J.  
United States District Court for the Southern District of New York  
500 Pearl Street, Room 701  
New York, NY 10007

**Re: Ina Kodra v. M&T Bank Corporation, Case No. 1:20-cv-3682 -- Joint Request to extend responsive pleading date & adjourn initial pretrial conference**

Dear Judge Liman:

Pursuant to Rules 1(B) and 1(C) of Your Honor's Individual Practices in Civil Cases, Plaintiff Ina Kodra ("Plaintiff") and Defendant M&T Bank Corporation ("Defendant") respectfully make this joint request for an agreed 60-day extension of Defendant's time to respond to the Complaint from August 4, 2020 to October 5, 2020, to facilitate further settlement discussions between the parties. The parties further respectfully request a corresponding adjournment of the Initial Pretrial Conference scheduled for August 12, 2020 at 10:30 am (including any accompanying deadlines as set forth in the Court's Order granting Defendant's Consent Letter Motion for Extension) to a date and time after the deadline for Defendant's response to the Complaint and which is most convenient for the Court.

This is the second request for such an extension of time in this matter, this one being joint and the initial request being made by Defendant with Plaintiff's agreement. Defendant's first agreed request for an extension of time to respond to the Complaint and adjournment of the Initial Pretrial Conference was granted on June 5, 2020. Since June 5th, the parties have engaged in productive settlement communications, but respectfully need a further extension and adjournment to permit them to engage in additional meaningful settlement discussions without incurring and being distracted by the costs and burdens of litigation. For example, absent the requested extension and adjournment, the parties' Rule 16(f) conference must occur by July 22, 2020; Defendant's responsive pleading(s) to the Complaint would be due by August 4, 2020; and the parties' proposed Case Management Plan and Scheduling Order would be due by August 5, 2020. All such endeavors would require substantial effort, which the parties believe would adversely affect their settlement negotiations and chances of success.

Counsel for the parties met and conferred by phone on Wednesday, July 8, 2020, and Plaintiff's counsel agrees with and jointly makes this request with Defendant.

The parties thank the Court in advance for its consideration of this request.

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Respectfully submitted,

/s Sam S. Shaulson

Sam S. Shaulson, Morgan Lewis & Bockius LLP

*Counsel for Defendant*

Respectfully submitted,

/s Griselda Vega Samuel, Mexican American Legal  
Defense and Educational Fund

*Counsel for Plaintiff*

cc: All Counsel of Record (via ECF)